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May 8, 2002

Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals, 445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 02-08
Ex Parte filing

Dear Ms. Dortch:

On Wednesday, May 8, I e-mailed the following technical summary regarding the above referenced proceeding, to Thomas Sugrue, Bureau Chief, Wireless Telecommunications and Barry Ohlson, Legal Advisor, Public Safety & Private Wireless Division. Following that, I spoke with Mr. Sugrue and Mr. Ohlson, and with Peter Tenhula, Senior Legal Advisor to Chairman Powell regarding Itron's need to have the technical requirements reflected in the summary reflected in the Commission's service rules.

If there are any questions in this regard, please contact the undersigned.

Sincerely,



Henry Goldberg
Attorney for Itron, Inc.

cc: Thomas Sugrue
Barry Ohlson
Peter Tenhula

TECHNICAL REQUIREMENTS FOR UTILITY TELEMETRY IN THE 1429.5-1432 MHz BAND

In order to protect Wireless Medical Telemetry Service ("WMTS") at 1427-1429.5 MHz, utility telemetry ("UT") at 1429.5 - 1432 MHz band must meet the following technical requirements:¹

1. The maximum fixed transmitter output power would be no greater than 1 watt EIRP in the 1429.5 - 1430.5 MHz band, no greater than 10 watts EIRP in the 1430.5 - 1431.5 MHz band, and no greater than 100 watts EIRP in the 1431.5 - 1432 MHz band.
2. The maximum level of "out-of-band" emissions between UT use and WMTS use would be no greater than 150u V/m, H and V, measured over any 1 MHz with an averaging detector as measured at the interference site. In the case of narrow band systems operating very close to the edge of the user's primary band, integrating multiple measurements with varying capture bandwidths will be needed.
3. UT use of mobile transmitters would be limited to 25 milliwatts in the 1429.5-1430 band and 1 watt above 1430 MHz. Transmission would be disabled outside of geographic areas in which UT is primary.
4. Specific assignments in the UT band would be subject to frequency coordination by the designated UT frequency coordinator and entered into the frequency database for the WMTS maintained by the American Society of Health Care Engineers.
5. Co-channel use of the UT band by WMTS users and co-channel use of the WMTS band by UT licenses would be permitted on a secondary, non-interference basis to an existing or future primary licensee of that band, as follows:
 - co-channel users must be located at a sufficient distance apart to maintain a field strength of < 150uV/m, H and V, measured over any 1 MHz with an averaging detector as measured at the interfered site.
 - Any dispute between the primary and secondary users would be resolved by reference to an industry-standard propagation study conducted at the expense of the secondary user and approved by the frequency coordinator/manager for each of the services.

¹ This description does not address technical requirements for the so-called "flip areas."

